

Exhibit A

Proposed Order

**IN THE UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF DELAWARE**

In re: IMERYS TALC AMERICA, INC., <i>et al.</i> , ¹ Debtors	Chapter 11 Case No. 19-10289 (LSS) (Jointly Administered)
IMERYS TALC AMERICA, INC. and IMERYS TALC VERMONT, INC., Plaintiffs, v. JOHNSON & JOHNSON and JOHNSON & JOHNSON CONSUMER INC., Defendants.	Adv. Pro. No. 21-51006 (LSS)

**ORDER GRANTING THE FUTURE CLAIMANTS’
REPRESENTATIVE’S MOTION TO INTERVENE**

Upon consideration of the motion (the “Motion”) of James L. Patton, Jr., the legal representative (the “FCR”) for future talc personal-injury claimants against the Debtors to intervene as a Plaintiff in the above-captioned adversary proceeding (the “Adversary Proceeding”) pursuant to Section 1109(b) of the Bankruptcy Code, Rule 24 of the Federal Rules of Civil Procedure (“FRCP”), Rule 7024 of the Federal Rules of Bankruptcy Procedure, and the *Order Appointing James L. Patton, Jr., as Legal Representative for Future Talc Personal Injury Claimants*, Nunc Pro Tunc to the Petition Date [Docket No. 647]; and this Court having reviewed

¹ The Debtors in these cases, along with the last four digits of each Debtor’s federal tax identification number, are: Imerys Talc America, Inc. (6358), Imerys Talc Vermont, Inc. (9050), and Imerys Talc Canada Inc. (6748). The Debtors’ address is 100 Mansell Court East, Suite 300, Roswell, GA 30076.

the Motion; and this Court finding that it has jurisdiction of this matter pursuant to 28 U.S.C. §§ 157 and 1334; and consideration of the Motion and the relief requested therein being a core proceeding pursuant to 28 U.S.C. § 157(b); and venue being proper before this Court pursuant to 28 U.S.C. §§ 1408 and 1409; and appropriate notice of the Motion having been provided; and good cause appearing therefor;

IT IS HEREBY ORDERED THAT:

1. The Motion is granted.
2. The FCR is permitted to intervene as a Plaintiff in the Adversary Proceeding and shall be deemed to so intervene.
3. This Court shall retain jurisdiction to hear and determine all matters arising from or related to the implementation of this Order.